



FW: scan: Contingency Plan
kishor to: Debbie Moody
Cc: "BJ Mason"

03/14/2012 11:32 AM

1 attachment



img-3141020-0001.pdf

Good Morning Debbie

Please find the attached our revised "Contingency Plan".

Thanks

Kishor Parikh
Mid-Atlantic Finishing Corp.
Phone: 301-322-2233 ext.213
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www.maf.com

-----Original Message-----

From: scan@maf.com [mailto:scan@maf.com]
Sent: Wednesday, March 14, 2012 11:20 AM
To: kishor@maf.com
Subject: scan: Contingency Plan

This is a scan from the Mid-Atlantic Finishing scanner.

Number of Images: 15
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Device Name: WorkCentre 7132
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Contingency plan

for

Hazardous Materials/Hazardous Waste Release

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1. Introduction

1.1 Scope

This document constitutes the written Contingency Plan for Mid-Atlantic Finishing in Capitol Heights, MD. This document has been prepared in accordance with COMAR 26.13.05.04

The purpose of this plan is to set forth policies, procedures, and work practices for Mid-Atlantic Finishing's Hazardous Waste Materials Contingency plan in order to minimize the hazards to human health and the environment due to fires, explosions or an unplanned release of hazardous material into the air, soil or ground water. In case of any such occurrence, the provisions of this plan will be carried out immediately.

This plan is intended to be an addendum to and work concurrently with Mid-Atlantic Finishing's Emergency Action and Fire Prevention Plan and Hazardous Communication Program.

1.2 Policy

In our continuing effort to provide a safe and healthful environment, Mid-Atlantic Finishing has developed this Emergency Response & hazardous Waste Contingency Plan to ensure a safe and healthy environment for its employees and community. All Mid-Atlantic Finishing employees will be provided training to ensure they know the procedures to follow in case of a hazardous waste emergency.

1.3 Accessibility

This document will be kept in locations listed below and is readily available to all employees and enforcement officials.

Location: Notice Bulletin in Break Room and Office

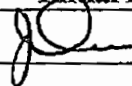
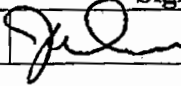
1.4 Review and Updates

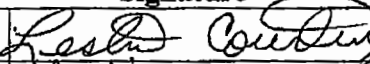

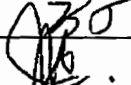

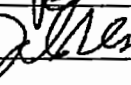
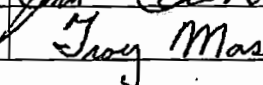
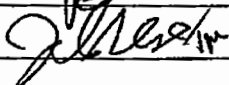
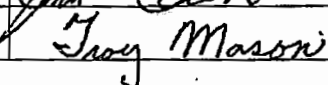
This Contingency Plan will be reviewed and appropriately updated by the Primary Emergency Coordinator whenever:

1. Applicable regulations have been amended
2. Revisions to the existing plan have been necessitated in order to improve emergency procedures.
3. The operating procedures or materials used at Mid-Atlantic Finishing are altered.
4. The names or phone numbers on the Emergency Coordinator List, Emergency Response List, or Emergency Telephone List are modified.

Copies of the updated plan will be made available to management, supervisors and employees.

This Contingency Plan has been reviewed and approved by Mid-Atlantic Finishing's Emergency Coordinator

Initial Review	Reviewed By (Print Name)	Signature
	John O'Brien	

Additional Review	Reviewed By (Print Name)	Signature
✓ LC	Lester Courtney	
✓ KP	Kishor Parikh	
	Kely Jose	
	Jim McCormick	
	Troy Mason	

2. Emergency Coordinator

Mid-Atlantic Finishing has assigned a Primary Emergency Coordinator who has overall responsibility for the execution of the plan.

Primary Emergency Coordinator is:

John Obrien, 301-322-2233 ext.208

3. Emergency Procedures

3.1 Environmental Emergency

In the event of an emergency, which may result in the release of hazardous chemicals, the Emergency Coordinator must be called immediately.

The Emergency Coordinator will:

1. Determine the source and extent of any discharged materials inside/outside the facility.
2. Note wind direction.
3. Notify facility personnel, as required, using the necessary alarm and/or communication systems. Evacuation routes and alternate routes have been designated and identified to all employees. The alternate route(s) should be used

if the primary evacuation route contains potential hazards such as contamination from a chemical release, fire, smoke, or could otherwise endanger personnel. An alternate route should be chosen if using the primary route could delay or hinder a safe evacuation.

4. Obtain the Material Safety Data Sheets (MSDS) on the spilled substance(s) to determine required fire or spill control measures.
5. Depending upon the level of employee response training, and the hazards of the spilled substance(s), action may be taken to prevent the spread of any hazard by isolating the area and attempting containment.
6. If warranted, notify the appropriate local or state agencies (see Emergency Contact List).
7. When necessary, inform the local hospital of the hazardous materials involved in the incident and the possible injuries/illness, which might occur from exposure.

3.2 Emergency Coordinator First Response

In the event of an emergency, the Emergency Coordinator will immediately assess the scope and magnitude of the emergency and act as team leader to carry out the procedures outlined in this plan. The Emergency Coordinator will immediately determine if drains and air handling systems have to be protected or sealed off.

It is also the Emergency Coordinator's responsibility to assist local, state and federal agencies (police, fire etc.) with emergency response and locations of on-site emergency response equipment.

The Emergency Coordinator will remain on-site until the emergency has been downgraded and all local, state and federal authorities have concluded their emergency response and have left the facility.

3.3 Emergency Evacuation

An emergency may result not only from a fire or explosion but also from a release of hazardous chemicals. The Emergency Coordinator will have the responsibility of assessing direct and indirect effects of any emergency and will conclude if a building needs to be evacuated. This will include the assignment of alternate evacuation route(s). To ensure the orderly evacuation of all personnel when an emergency exists involving a hazardous chemical, the evacuation procedures outlined in Section 3.3 of the Emergency Action and Fire Prevention Plan will be followed.

The Emergency Coordinator will assist the local authorities in determining whether the local surrounding area needs to be evacuated.

4. Secondary Response

4.1 Clean up

The affected area will be properly cleaned and decontaminated as dictated by the type of emergency. The surface of contains, floors and equipment must be decontaminated and the clean up debris placed in designated containers.

All spill residue, contaminated absorbent, rags, towels, etc., must be placed in containers, as designated by the Emergency Coordinator.

All equipment used in the clean up of any contaminated areas shall be decontaminated and inspected by the Emergency Coordinator before being returned to the proper storage area.

4.2 Chemical Decontamination

If the emergency involves the spill or release of a hazardous chemical or hazardous chemicals are generated during the emergency, the following decontamination plan should be used.

1. The site should be broken down into three areas or zones of varying hazard degree
 - a. Hazardous Area: The area of spill or direct chemical contact. This area should be secured to keep people from entering
 - b. Clean Area: This area is the safe area outside of hazardous area where personnel and equipment will not come in contact with the chemical release.
 - c. Decontamination area: This area can be any area so designated, which will allow for the decontamination of exposed employees, clean up personnel and equipment, and the disposal of all contaminated products from the hazardous area. This area originally starts out as the Clean Area.
2. Clean up and back up personnel shall work on pairs. Only clean up personnel should enter the Hazardous area. The back up personnel should remain in the Clean Area unless needed. All clean up equipment (rags, etc.) should be disposed of in the Hazardous Area unless it is to be decontaminated for future use. Proper receptacles will be provided.
3. Once the Hazardous Area has been cleaned, all receptacles containing clean up from the Hazardous Area should be sealed and made ready for the clean up contractor. Equipment used in this clean up that can be decontaminated should be taken to the Decontamination Area. All personnel and reusable equipment will be decontaminated in the Decontamination Area by acceptable practice.

4.3 Reporting

If a discharge is determined to contaminate the surrounding area (soil or water to any degree), the local branch of the Maryland Department of the Environment (MDE) must be notified. The report should describe the type of substance and quantity discharged (if known), the location of the discharge, the actions being taken, and plans for containment and disposal. The local agency will determine if the amount of discharge is of a reportable quantity under Federal regulations. Incidents of reportable quantity should be reported to the National Response Center. Within 15 days of any such incident, a comprehensive report will be submitted to the local branch of the MDE. This report will include, but not be limited to, the following.

1. Name, address and telephone number of the owner.
2. Name, address and telephone number of the facility where the incident occurred.
3. Date, time, and type of incident.
4. Name and quantity of materials involved if known.
5. The extent of injuries, if any.
6. An assessment of actual or potential hazards to human health or the environment, where this is applicable. Supportive information can be found on the MSDS.
7. Assessment of the scope and magnitude of the problem.
8. Description of the immediate actions that have taken and the estimated quantity and disposition of recovered material that resulted from the incident.
9. Implementation schedule suggesting measures to eliminate reoccurrence of the problem.

MDE will be notified when the facility affected by such an emergency, is to be reactivated.

5. Inspections

5.1 Weekly Inspections

On a weekly basis, the Emergency Coordinator will ensure the following:

- a. All hazardous wastes are in proper containers, and that these containers are properly stored.
- b. The hazardous wastes are not leaking and show no signs of leakage.
- c. Containment devices are in place as needed.

Manufacturing Address:

4656 Addison Road
Capitol Heights, MD 20743
Phone: 301-322-2233

Mid-Atlantic Finishing Emergency Coordinators:

Name	Facility Phone	Cell Phone	Title
John O'Brien	301-322-2233	301-538-0758	Plant Engineer
Lester Courtney	301-322-2233	301-814-6469	Assistant Waste treatment Operator
Kishor Parikh	301-322-2233	301-906-3785	Chemist
Kelvy Jose	301-322-2233	301-219-9785	Production Supervisor
Jim McCormick	301-322-2233	301-919-0573	General Manager
Troy Mason	301-322-2233	301-385-2469	Vice President

List of Emergency Equipment with location:

Name of equipment	Type	Location
Fire Extinguishers	A, B, and C	Appropriate locations at offices, Main level and production Area
Decontamination	Emergency Shower Station	Production Area
Spill Control	Platforms, absorbents	Chemical area, Main floor, Cyanide room
Communication System	By Mouth	

Program Monitoring:

1. RCRA training
2. Hazardous Communication
3. Emergency Action & Fire Prevention
4. Lockout/Tagout
5. Bloodborne Pathogens Exposure Control
6. Respiratory Protection
7. Hearing Conservation
8. Confined Space Entry
9. Forklift Safety and Operation

Emergency Response Information:

Fire / Police / EMS	911
P.G. County Fire Department	301-883-5200
State Emergency Response Commission	410-486-4422
National Response Center	800-424-8802
EPA Region IV, Title III Unit	800-438-2474
Spill Response; AEG Environmental	443-650-0913
Chemtrec	800-424-9300
WSSC Water	301-206-8594
Maryland OSH	410-333-4197
Poison Control	800-222-1222
Miss Utility	800-257-7777
Safety Compliance Consultant (ACS)	800-554-3577, or 610-755-0728

Registrations:

EPA ID	MDD985386143
S.I.C.	3471
N.A.I.C.S.	33213

Chemical Name (Common)
Alodine 1200S
Boric Acid
Broco 50-L-3
Broco 893M
Broco 87NC
C-75
Caustic Soda (Liquid)
Copper Cyanide
DeOxide D
ENOVA M14 AM and ENOVA H15 AM
ENOVA M14 BM and ENOVA H15 BM
ENOVA M14 CMP and ENOVA H15 CMP
ENPROX 702
EFN-AC Sulfamic Acid
GL-826
HASA2 (Anti-foam)
Hydrochloric Acid
Methane Sulfonic Acid
Nickel Chloride
Nickel Sulfamate
Nitric Acid
Polymer GL-90
Potassium Cyanide
Potassium Silver Cyanide
Rochelle Salt
1025 R Replanisher
Sodium Hypo-Chlorite (Bleach)
STARGLO AntiOx
STARGLO Lead Methane Sulfonate
STARGLO Methane Sulfonic Acid
STARGLO Stannous Methane Sulfonate
Stannous Sulfate
Sulfuric Acid
TCP-HF
TASKLENE SE-1R
Zincate

List of Process Baths

CHEMICAL NAME (COMMON)	WORK AREA	TYPE OF HAZARDOUS
ALODINE 1200S	YELLOW CHROMATE	OXIDIZER & CORROSIVE
BROCO 50-L-3	CLEANING LINE PRODUCTION	CORROSIVE
BROCO 893M	CLEANING LINE PRODUCTION	CORROSIVE
C-75	WASTETREATMENT	CORROSIVE
CAUSTIC SODA LIQUID	WASTETREATMENT	CORROSIVE
COPPER CYANIDE	COPPER CYANIDE PLATING	TOXIC
DEOXIDE D	CLEANING LINE PRODUCTION	CORROSIVE & TOXIC
EN PROX 702	CLEAR CHROMATE	CORROSIVE
ENSTRIP AU-78	N/A	POISON
ENOVA M14 AM & ENOVA H 15 AM	ELECTROLESS NICKEL PLATING	NICKEL, CARCINOGEN
GL-826	WASTETREATMENT	CORROSIVE
HYDROCHLORIC ACID	WASTETREATMENT	CORROSIVE
NICKEL CHLORIDE SOLUTION	WOOD NICKEL	NICKEL, CARCINOGEN
NICKEL SULFATE SOLUTION	BRIGHT NICKEL	NICKEL, CARCINOGEN
NICKEL SULFAMATE SOLUTION	SULFAMATE NICKEL	NICKEL, CARCINOGEN
NITRIC ACID	SILVER NICKEL STRIPPER & CLEANING LINE	CORROSIVE
PC-1111	NOT IN USE	CORROSIVE
POTASSIUM CYANIDE	COPPER, SILVER CYANIDE PLATING	TOXIC
POTASSIUM SILVER CYANIDE	SILVER CYANIDE PLATING	POISON
PROPANE	FUEL for FORKLIFT	FLAMMABLE
STANNOUS SULFATE SOLUTION	TIN PLATING	CORROSIVE
STARGLO LEAD METHANE SULFONATE	TIN/LEAD PLATING	CORROSIVE & TOXIC
STARGLO STANNOUS METHANE SULFONATE	TIN/LEAD PLATING	CORROSIVE
SULFAMIC ACID	SULFAMATE NICKEL	CORROSIVE
SULFURIC ACID	TIN PLATING & CLEANING LINE	CORROSIVE
TASKLEEN SE-1R	CLEANING LINE PRODUCTION	CORROSIVE
1025 R REPLANISHER	SILVER CYANIDE PLATING	TOXIC

[illegible]

CERTIFICATION OF TRAINING
UNDER 40 CFR 264.16

MID ATLANTIC FINISHING
CAPITOL HEIGHTS, MD

RCRA HAZARDOUS WASTE MANAGEMENT TRAINING
FOR REGULATED GENERATORS

FEBRUARY 24, 2012


The following employees were in attendance:

Troy Mason
Kishor Parikh
Lester Courtney

Jim McCormick
John O'Brien
Kelvy Jose



Nicole S. Sheets, CSP, CIH
American Compliance Systems, Inc.
2874 W Ridge Pike
Norristown, PA 19403



Mid Atlantic Finishing
4656 Adison Road
Capitol Heights, MD 20743

Training Record

Think Safety ♦ Work Safely

I. Training Information

Company:	Mid Atlantic Finishing		
Training Topic:	BCRA Generator - Annual	Date:	02/24/12
Training Method:	PPT	Video	Lecture
Instructor:	Nicole S. Sheets, C.I.H., CSP	Other:	None
Instructor Signature:	Nicole S. Sheets		

II. Attendees

	Print Name	Signature
1	Troy Mason	[Signature]
2	KISNOE Patrick	[Signature]
3	LESTER COURTNEY	[Signature]
4	Jim Mc Cormick	[Signature]
5	JOHN O'BRIEN	[Signature]
6	Kelvy [unclear]	[Signature]
7	Kelvy	
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20		

This training was conducted by:

American Compliance Systems
2874 West Ridge Pike, 2nd Floor
Norristown, PA 19403

Please fax a copy of this document to (610) 755-0737 for our records.

Mid Atlantic Finishing Corp
Visitor's Log

Date	Badge Number	Badge issuer's Initials	Time-In	Name of the Visitor	Company	Mobile Phone number	Person / Department visiting	Time-Out	Signature of the visitor	Security Initials
			AM					AM		
			PM					PM		
			AM					AM		
			PM					PM		
			AM					AM		
			PM					PM		
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3/14/12

Mid-Atlantic was referred to the State on 1/19/12. A follow up inspection was done by the State on 2/9/12, returning the facility to compliance with the exception of (2) outstanding State violations (Training and Contingency Plan update). Training was given on 2.24.12 according to the information received on 3/5/12. EPA inspector Debra Moody received an updated and revised Contingency Plan from Mid-Atlantic Co. on 3/14/12. All violations have been corrected and the facility is in total compliance.